

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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OKSANA S. BAIUL and OKSANA, LTD :

Plaintiff, :

-against- :

STEPHEN DISSON and  
DISSON SKATING, LLC :

Defendants :

Civil Action No. 13 cv 02208-KBF

**MOTION FOR LEAVE  
TO AMEND COMPLAINT**

-----X  
Plaintiff, Oksana S. Baiul and Oksana, LTD ("Plaintiffs"), by their attorney, Raymond J. Markovich, Esq., hereby respectfully requests that the Court grant leave for the Plaintiff to amend their Complaint as attached hereto in the Amended Complaint.

**Rule 15**

Plaintiff believes that she meets the standard for amending pleadings under Federal Rule of Civil Procedure 15 and that justice so requires the Amended Complaint in accordance with Rule 15(a)(2) for the following reasons:

1. The only changes made in such Amended Complaint are that Plaintiff has corrected the damages to match the actual damages provided to Defendants under Rule 26(a)(1).

Plaintiff believes that the above are material issues that would have require an amendment of her pleadings now, even at this late a date, in accordance with Rule 15(a)(2).

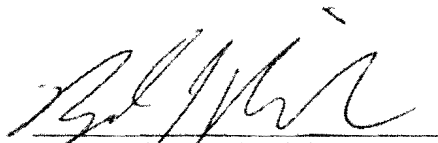
**Scheduling**

The Amended Pleading should have no effect on the current schedule since the Defendants have had the actual damages provided under Rule 26(a)(1) for a couple of months already.

**Conclusion**

Plaintiff respectfully requests that the Court grant leave for the Plaintiff to amend her Complaint as attached hereto in the Amended Complaint.

Dated: West Hollywood, California  
September 7, 2013



Raymond J. Markovich, Esq.  
Attorney for Plaintiff - Oksana S. Baiul  
and Oksana, LTD  
351 Westbourne Drive  
West Hollywood, CA 90048  
(323) 401-8032

ordered

Motion for leave to amend  
granted on consent.

The Amended Complaint is  
13 CV 02208 should be filed  
on ECF immediately.

The Clerk shall terminate the  
motion as ECF No. 22.

9/24/13

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USDJ